

COPY

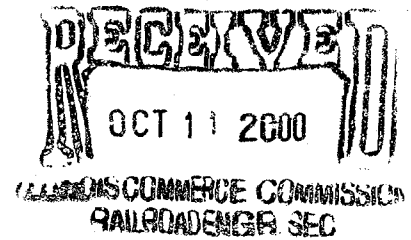
STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION

CITY OF GRANITE CITY,
an Illinois municipal corporation,

Petitioner,

ILLINOIS DEPARTMENT OF TRANSPORTATION
GATEWAY EASTERN RAILWAY COMPANY,
GATEWAY WESTERN RAILWAY COMPANY,
NORFOLK SOUTHERN RAILWAY COMPANY,
and UNION PACIFIC RAILROAD,

Respondents.



Docket No. T00-0003

**REQUESTS FOR PRODUCTION BY RESPONDENTS GATEWAY EASTERN
RAILWAY COMPANY AND GATEWAY WESTERN RAILWAY COMPANY
DIRECTED TO ILLINOIS COMMERCE COMMISSION STAFF**

COME NOW Respondents Gateway Eastern Railway Company and Gateway
Western Railway Company and pursuant to Section 200.360(c) of the Illinois
Commerce Commission Rules of Practice and Rule 214 of the Illinois Rules of Civil
Procedure propound the following Requests for Production to Illinois Commerce
Commission Staff to be answered in writing with a certificate of compliance under oath
within 28 days of the date of service of these requests.

1. Any and all documents relating to any study or report regarding the rail-
highway grade separation project (including associated grade crossing closures and road
relocations) that is the subject matter of the Petition filed by the City of Granite City
in this cause (hereinafter referred to as "Pontoon Road Grade Separation Project").

DOCKETED

RESPONSE:

2. Any and all documents or reports prepared in the past 10 years relating to any investigation, study, or analysis of safety issues with respect to the Pontoon Road grade crossing in Granite City.

RESPONSE:

3. Any and all documents or reports relating to any cost-benefit analysis of the Pontoon Road Grade Separation Project

RESPONSE:

4. Any and all documents that discuss how the Pontoon Road Grade Separation Project benefits each railroad that operates trains through the grade crossing at Pontoon Road.

RESPONSE:

5. Any and all documents that quantify in dollars or as a percentage of the total project costs the benefit of the Pontoon Road Grade Separation Project to the railroads that operate through the grade crossing at Pontoon Road.

RESPONSE:

6. Any and all documents that discuss how the Pontoon Road Grade Separation Project benefits the City of Granite City and/or its citizens.

RESPONSE:

7. Any and all documents that quantify in dollars or as a percentage of the total project costs the benefit of the Pontoon Road Grade Separation Project to the City of Granite City and/or its citizens.

RESPONSE:

8. Any and all documents that discuss how the Pontoon Road Grade Separation Project benefits Madison County and/or its citizens.

RESPONSE:

9. Any and all documents that quantify in dollars or as a percentage of the total project costs the benefit of the Pontoon Road Grade Separation Project to Madison County and/or its citizens.

RESPONSE:

10. Any and all documents that discuss how the Pontoon Road Grade Separation Project benefits the State of Illinois and/or its citizens.

RESPONSE:

11. Any and all documents that quantify in dollars or as a percentage of the total project costs the benefit of the Pontoon Road Grade Separation Project to the State of Illinois and/or its citizens.

RESPONSE:

12. Any and all documents that discuss or relate to any application by anyone for Illinois Commerce Commission funding of any type for the Pontoon Road Grade Separation Project.

RESPONSE:

13. Any and all documents relating to any analysis of the impact the failure to include federal funding in the Pontoon Road Grade Separation Project will have on the availability of state funding for other highway or highway-rail crossing projects in the state of Illinois over the next ten years.

RESPONSE:

14. Any and all documents that discuss or analyze how much of the total cost of the Pontoon Road Grade Separation Project is directed to relocation of roads and utilities.

RESPONSE:

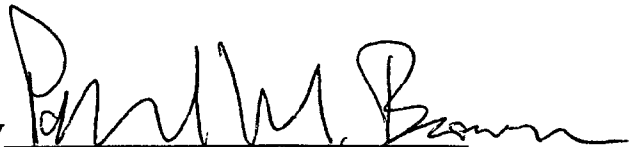
15. Any and all documents relating to any investigation, study, or analysis comparing the number of projected motor vehicle-train collisions at the Pontoon Road Crossing in the future if the grade crossing is left in its present configuration versus the number of projected future motor vehicle-train collisions at the crossing if a grade separation is built versus the number of projected motor vehicle-train collisions at the crossing in the future if some other type of upgrade is made to the crossing.

RESPONSE:

OF COUNSEL:

Thompson Coburn LLP

Respectfully submitted,

By 
Paul M. Brown, #03125999

One Firststar Plaza

St. Louis, Missouri 63101

(314) 552-6016 telephone

(314) 552-7016 facsimile

Attorneys for Gateway Eastern
Railway Company and Gateway
Western Railway Company

CERTIFICATE OF SERVICE

The undersigned states that a true and correct copy of the foregoing requests for production were deposited in the U.S. Mail, first Class, postage prepaid on the 3rd day of October, 2000, addressed to each of the following:

Kevin Sharpe, Director of Processing
Illinois Commerce Commission
527 East Capitol
P.O. Box 19280
Springfield, IL 62794-9280

Joseph O'Brien
Hearing Examiner
527 East Capitol Avenue
P.O. Box 19280
Springfield, IL 62794

Bob Berry
Staff Attorney
Illinois Commerce Commission
527 East Capitol Avenue
Springfield, IL 62794

Neil F. Flynn
Attorney at Law
1035 South Second Street
Springfield, IL 62704

Stacey C. Hollo
Illinois Department of Transportation
2300 South Dirksen Parkway
Springfield, IL 62764

Dean W. Jackson
Attorney at Law
522 E. Monroe, Suite 306
Springfield, IL 62701

Donna Caton, Chief Clerk
Illinois Commerce Commission
527 East Capitol Avenue
P.O. Box 19280
Springfield, IL 62794

Edward C. Fitzhenry
Lueders, Robertson & Konzen
1939 Delmar Avenue
P.O. Box 735
Granite City, IL 62040

Charles J. Swartwout
Gundlach, Lee, Eggmann, Boyle &
Roessler
5000 West Main Street
Belleville, IL 62223

